

EXHIBIT A

From: [Wroblewski, Karlee](#)
To: [TQDelta Listserv](#); [TQD-MHM-TX@mcandrews-ip.com](#)
Cc: [Nokia309](#); [DG-ARRIS-TQDelta@goodwinlaw.com](#); [ddacus@dacusfirm.com](#)
Subject: RE: Case 2:21-cv-00310-JRG TQ Delta, LLC v. CommScope Holding Company, Inc. et al - Nokia's Prior Art Elections
Date: Tuesday, August 30, 2022 4:42:13 PM

Counsel,

In light of TQ Delta's expert reports served last night, we understand that TQ Delta has dropped the '055 and '988 patents against Nokia. Please let us know if that understanding is incorrect. Accordingly, Nokia revises its provisional "Final Election of Asserted Prior Art" as follows. As detailed in my email below, Nokia reserves all rights to amend its elections based on the Court's ruling on its pending motion for further narrowing.

- U.S. Patent No. 7,570,686
 - Golden ATU System/Ryckebush in view of T1.413-1998
 - U.S. Patent No. 6,636,603 to Milbrandt in view of T1.413-1998
- U.S. Patent No. 9,300,601
 - U.S. Patent No. 6,222,858 to Counterman in view of Alcatel A1000
 - WO1999039468A3 to Edvardsen in view of U.S. Patent No. 6,665,733 to Witkowski
 - WO1999039468A3 Edvardsen in view of Alcatel A1000
- U.S. Patent No. 9,894,014
 - U.S. Patent No. 6,222,858 to Counterman in view of Alcatel A1000
 - WO1999039468A3 to Edvardsen in view of U.S. Patent No. 6,665,733 to Witkowski
 - WO1999039468A3 Edvardsen in view of Alcatel A1000
- U.S. Patent No. 7,844,882
 - U.S. Patent No. 7,269,208 to Mazzoni in view of ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
 - U.S. Patent No. 7,269,208 to Mazzoni in view of ITU-T SG15/Q4 contribution LB-031, titled "VDSL2 – Constraining the Interleaver Complexity"
 - [Fadavi-Ardekani in view of ITU-T G.993.1 \(6/2004\), Very High Speed Digital Subscriber Line Transceivers](#)
- U.S. Patent No. 8,495,473
 - U.S. Patent No. 7,269,208 to Mazzoni in view of ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
 - U.S. Patent No. 7,269,208 to Mazzoni in view of ITU-T SG15/Q4 contribution LB-031, titled "VDSL2 – Constraining the Interleaver Complexity"
 - [Fadavi-Ardekani in view of ITU-T G.993.1 \(6/2004\), Very High Speed Digital Subscriber Line Transceivers](#)

- U.S. Patent No. 9,547,608
 - U.S. Patent No. 7,269,208 to Mazzoni in view of ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
 - U.S. Patent No. 7,269,208 to Mazzoni in view of ITU-T SG15/Q4 contribution LB-031, titled “VDSL2 – Constraining the Interleaver Complexity”
 - Fadavi-Ardekani in view of ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
- U.S. Patent No. 8,090,008
 - A Method to Reduce the Probability of Clipping in DMT-Based Transceivers” by Denis J. G. Mestdagh and Paul M. P. Spruyt
 - U.S. Patent No. 6,625,219 to Stopler
 - U.S. Patent No. 6,657,949 to Jones
- U.S. Patent No. 8,594,162
 - Temporary Document SC-060 titled “G.gen, G.dmt.bis, G.lite.bis: Protocol for On-Line Reconfiguration of ADSL”
 - U.S. Patent Pub. No. US2002/0172188 to Wunsch
 - ITU-T Recommendation G.992.1 (06/99) in view of Temporary Document SC-060 titled “G.gen, G.dmt.bis, G.lite.bis: Protocol for On-Line Reconfiguration of ADSL”
- U.S. Patent No. 8,468,411
 - ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers in view of ITU-T Recommendation G.992.3 (01/2005)
- U.S. Patent No. 9,094,348
 - ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
 - “Interleaved FEC/ARQ coding for QoS multicast over the Internet” by Chen et al. in view of ITU-T Recommendation G.992.3 (01/2005)
 - U.S. Patent No. 8,775,890 to Yap, et al. in view of ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
- U.S. Patent No. 10,833,809
 - ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
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- U.S. Patent No. 9,485,055
 - EP 1,507,353 A2 to Kawakami et al. in view of ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
- U.S. Patent No. 9,154,354
 - EP 0753948A1 to Peeters et al. in view of U.S. Patent No. 6,205,410 to Cai

EP 0753948A1 to Peeters et al. in view of U.S. Patent No. 6,516,027 to Kapoor et al.

- U.S. Patent No. 8,937,988
 - EP 0753948A1 to Peeters et al. in view of U.S. Patent No. 6,205,410 to Cai
 - EP 0753948A1 to Peeters et al. in view of U.S. Patent No. 6,516,027 to Kapoor et al.

Additionally, in the event that the Court grants Nokia's alternative relief, Nokia elects all of the references disclosed by the expert reports served on behalf of Nokia dated yesterday, August 29, 2022.

Best,
Karlee

Karlee N. Wroblewski | Alston & Bird LLP
704.444.1299 office | 715.808.4562 mobile

From: Wroblewski, Karlee <Karlee.Wroblewski@alston.com>

Sent: Tuesday, August 30, 2022 12:10 AM

To: TQDelta Listserv <tqd@davisfirm.com>; TQD-MHM-TX@mcandrews-ip.com

Cc: Nokia309 <Nokia309@alston.com>; DG-CommScope-TQDelta <DG-ARRIS-TQDelta@goodwinlaw.com>

Subject: Case 2:21-cv-00310-JRG TQ Delta, LLC v. CommScope Holding Company, Inc. et al - Nokia's Prior Art Elections

Counsel,

Pursuant to the Court's Narrowing Order (Dkt. No. 128), Nokia serves the following provisional "Final Election of Asserted Prior Art." Nokia serves this election to comply with the Court's Order, but notes that in Defendants' Second Opposed Motion for Entry of Order Focusing Patent Claims (Dkt. No. 243), Defendants requested alternative relief in the form of the allowance of additional prior art references, totaling 40 references per Defendant. Dkt. No. 243 at 9. That motion is currently pending before the Court, and Defendants reserve all rights to amend its elections based on the Court's ruling on the pending motion.

Nokia provisionally elects:

- U.S. Patent No. 7,570,686
 - Golden ATU System/Ryckebush in view of T1.413-1998
 - U.S. Patent No. 6,636,603 to Milbrandt in view of T1.413-1998
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Best,
Karlee

Karlee N. Wroblewski | Alston & Bird LLP
704.444.1299 office | 715.808.4562 mobile

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